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Defendants  
Fenix International Limited  
and Fenix Internet LLC

*Additional Counsel appear on Signature Block*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

N.Z., R.M., B.L., S.M., and A.L.,  
individually and on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

FENIX INTERNATIONAL  
LIMITED, FENIX INTERNET LLC,  
BOSS BADDIES LLC, MOXY  
MANAGEMENT, UNRULY  
AGENCY LLC (also d/b/a DYSRPT  
AGENCY), BEHAVE AGENCY  
LLC, A.S.H. AGENCY, CONTENT  
X, INC., VERGE AGENCY, INC.,  
AND ELITE CREATORS LLC,

Defendants.

CASE NO.: 8:24-cv-01655-FWS-SSC

Hon. Fred W. Slaughter

**(1) JOINT STIPULATION  
SEQUENCING DEFENDANTS'  
FORTHCOMING DISPOSITIVE  
MOTIONS AND SETTING A BRIEFING  
SCHEDULE; and**

**(2) [PROPOSED] ORDER (filed under  
separate cover).**

1 Plaintiffs N.Z., R.M., B.L., S.M., and A.L. (collectively, “Plaintiffs”), Specially  
2 Appearing Defendants Fenix International Limited and Fenix Internet LLC (collectively,  
3 the “Fenix Defendants), and Defendants Content X, Elite Creators LLC, Moxy  
4 Management, and Verge Agency Inc. (collectively with the Fenix Defendants,  
5 “Defendants,” and collectively with Plaintiffs, the “Parties”) hereby stipulate and agree as  
6 follows:

7 WHEREAS, on July 29, 2024, Plaintiffs filed the complaint in the above-captioned  
8 action (ECF No. 1) (“Complaint”) against the Defendants, among others;

9 WHEREAS, based on prior stipulations and Court orders, Defendants’ deadline to  
10 plead, move, or otherwise respond to the Complaint is October 25, 2024;

11 WHEREAS, the Parties conducted a pre-motion meet and confer pursuant to Civil  
12 Local Rule 7-3 on October 18, 2024;

13 WHEREAS, during the meet and confer call: (1) the Fenix Defendants notified  
14 Plaintiffs of their intent to file motions to dismiss the Complaint for forum non conveniens  
15 (based on the U.K. forum selection clause in the OnlyFans website’s terms of service), lack  
16 of personal jurisdiction, and failure to state a claim, and also notified Plaintiffs that they  
17 intend to move to compel Plaintiffs to proceed in their real names, without the use of  
18 pseudonyms, in this lawsuit; and (2) the remaining Defendants notified Plaintiffs of their  
19 intent to file motions to dismiss the Complaint for failure to state a claim;

20 WHEREAS, Plaintiffs indicated that if they prevail against the Fenix Defendants’  
21 forum non conveniens motion, they wish to amend their Complaint before any Rule 12(b)  
22 motions are litigated;

23 WHEREAS, following additional meet and confer discussions, the Parties agree that  
24 it would be desirable to sequence the motions in a way calculated to promote the efficient  
25 allocation of the Court’s time and the Parties’ resources, and also to agree to a briefing  
26 schedule that provides all parties with sufficient time to consider and respond to  
27 Defendants’ forthcoming dispositive motions;

1 WHEREAS, the Parties agree that the most efficient course is for the Parties to  
2 litigate Defendants' personal jurisdiction and failure to state a claim motions after the Court  
3 decides whether to dismiss this Action for forum non conveniens and whether to compel  
4 Plaintiffs to proceed without pseudonyms, since the Court's rulings on these motions may  
5 either make it unnecessary for Defendants to file their personal jurisdiction and failure to  
6 state a claim motions, or inform how Plaintiffs wish to amend their Complaint before the  
7 Parties litigate Rule 12(b) motions;

8 WHEREAS, Plaintiffs have also requested that the Fenix Defendants notice the  
9 hearing date for their motion to dismiss for forum non conveniens and their motion to  
10 compel Plaintiffs to proceed in their real names for January 30, 2025, in order to  
11 accommodate counsel for Plaintiffs' trial schedule, and Defendants agree to that request as  
12 a matter of professional courtesy;

13 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and  
14 between the Parties, through their undersigned counsel and subject to Court approval, as  
15 follows:

16 1. The Fenix Defendants shall file their motion to dismiss for forum non  
17 conveniens, and their motion to compel Plaintiffs to proceed without pseudonyms, on or  
18 before October 25, 2024 ("October 25 Motions");

19 2. The Fenix Defendants shall notice the October 25 Motions for hearing on  
20 January 30, 2025;

21 3. Plaintiffs shall file their opposition to the October 25 Motions on or before  
22 November 22, 2024;

23 4. The Fenix Defendants shall file their replies in support of the October 25  
24 Motions on or before December 20, 2024;

25 5. The Defendants shall not be required to file Rule 12 motions, or otherwise  
26 respond to the Complaint, until after the October 25 Motions are decided by the Court;

6. Within 14 days after the Court decides the October 25 Motions, Plaintiffs shall either file an amended complaint or notify the Defendants that they do not intend to amend their Complaint;

7. The Defendants shall file their Rule 12 motions within 30 days after Plaintiffs file an amended complaint, or within 14 days after Plaintiffs notify the Defendants that they do not intend to amend their Complaint (to the extent such motions are not mooted by the Court's resolution of the October 25 Motions)

8. Nothing in this stipulation shall be construed to waive, forfeit, limit, or otherwise impair the Defendants' rights, remedies, claims, and defenses, including but not limited to any arguments related to personal jurisdiction and the proper venue for the above-captioned action.

DATED: October 23, 2024

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/ Jason D. Russell  
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*Attorneys for Specially Appearing Defendants*  
Fenix International Limited and Fenix Internet LLC  
***All other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.***

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